

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. CR-20-317-SLP
)	
JORGE LUIS VILLARREAL,)	
)	
Defendant.)	

**UNOPPOSED *THIRD* MOTION FOR TEMPORARY MODIFICATION
TO CONDITIONS OF RELEASE**

COMES NOW Defendant Jorge Luis Villarreal, through undersigned counsel, and moves this Court for a modification of Condition 7(f) of the Order Setting Conditions of Release for a limited and temporary purpose. In support, the Defendant offers the following:

1) On November 2, 2020, Mr. Villarreal was brought before Magistrate Judge Shon T. Erwin for initial appearance on a complaint. He was ordered released with an unsecured bond and conditions of supervision. *Docs. 6, 8, 9.*

2) The conditions of release include Condition 7(f) which limits his travel to the Southern District of Texas, where he resides, and this district, unless pre-approved by the U.S. Probation Office. *Doc. 8.*

3) Mr. Villarreal has twice sought and received permission from the Court to travel to Mexico for dental treatment. *Docs. 34, 37, 45, 46.* In those instances he

complied with the Court's instructions regarding notification. He has fully complied with all conditions of his release during the pendency of this case.

4) Mr. Villarreal now seeks temporary modification of Condition 7(f) in order to attend a family event in Mexico June 4-6, 2021.

5) Both counsel for the government and the Pretrial Services Unit of the U.S. Probation Office have been consulted and provided documentation regarding this request. AUSA Ashley Altshuler and PTS Officer Keely Everette state they do not object to him traveling to Mexico for this limited purpose.

Relief Requested

Based on the foregoing, Defendant respectfully requests this Court order a temporary modification to Condition 7(f) to allow Mr. Villarreal to make one trip to Mexico, to depart the U.S. no sooner than June 4 and return no later than June 6, 2021, with the additional requirement that he notify undersigned counsel promptly upon his return.

Respectfully submitted,

s/ Julia C. Summers

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of May, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to Assistant United States Attorneys Wilson McGarry, Ashley Altshuler, and Stanley West.

s/ Julia C. Summers
JULIA C. SUMMERS